

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO APWU INTERROGATORIES APWU/USPS-T1-6 THROUGH T1-12**

The United States Postal Service hereby provides the responses of witness James Boldt to the above-listed interrogatories of the American Postal Workers Union dated August 26, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT  
TO APWU INTERROGATORY**

**APWU/USPS-T1-6.** Please refer to your testimony, page 4 lines 13-16 where you state: “For example, alternate retail access channels have proven increasingly popular with postal customers, now accounting for approximately thirty-five percent of retail revenue and trending upward.” Please provide the retail revenue as a percentage of total retail revenue for each alternate retail access channel listed on page 4, lines 1-11 of your testimony.

**RESPONSE**

See the Attachment to the response to POIR 2, Question 18(a).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT  
TO APWU INTERROGATORY**

**APWU/USPS-T1-7.** Please define “geographically isolated” as you use it on page 11 line 7 of your testimony.

**RESPONSE**

I was attempting to dispel the perception that all retail locations that generated less than \$100,000 were located in the most remote corners of the country, far apart from the nearest other postal retail location.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT  
TO APWU INTERROGATORY**

**APWU/USPS-T1-8.** Please refer to Table 5 on Page 5 of your testimony.

- a) What retail facilities were included as alternatives in Table 5 of your testimony?
- b) What percentage of these alternative retail facilities within the 10 mile circle are postage stamp on consignment retailers?
- c) What percentage of the alternative retail facilities within the 5 mile circle are postage stamp on consignment retailers?
- d) What percentage of alternative retail facilities within the 10 mile circle provides money order services?
- e) What percentage of alternative retail facilities within the 5 mile circle provides money order services?

**RESPONSE**

- (a) Post Offices, stations, branches, retail annexes, and Contract Postal Units were included as Nearest Retail Locations in Table 5, page 12.
- (b) None. See the response to (a).
- (c) None. See the response to (a).
- (d-e) Postal Money Orders may be purchased at Post Offices, stations and branches at Contract Postal Units. Accordingly, 100 percent.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT  
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**APWU/USPS-T1-9.** Please refer to your response to NAPUS/USPS-T1-11 where you define “customer visits.” Do the number of customer visits as you have defined it factor into the selection of facilities to study for discontinuance?

**RESPONSE**

The number of customer visits was not a criterion used to define any group of facilities to be analyzed for review as a part of the RAO Initiative.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT  
TO APWU INTERROGATORY**

**APWU/USPS-T1-10.** Please refer to your response to NAPUS/USPS-T1-40. Are the possible roles that a Post Office may play in a community identified solely through customer input? If not, how else are these roles identified?

**RESPONSE**

Within the context of discontinuance review, that would be the principal source, supplemented by any information that local management may provide.

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- APWU/USPS-T1-11.** For each location being studied for closure,
- a) Please provide the number of PO Boxes that are provided free of charge because the addressees are not eligible for carrier delivery.
  - b) For the locations that contain PO Boxes for people ineligible for carrier delivery, what alternative service will the Postal Service provide to maintain ready access to essential postal services?

**RESPONSE**

- (a) As indicated in response to DBP/USPS-51, approximately 21 percent of Post Office boxes at the 2800 low earned workload RAO Initiative candidate Post Offices are no fee Group E boxes.
- (b) The Post Office boxes of Group E (no fee) customers from a discontinued Post Office could be relocated to a nearby retail postal facility, a Contract Postal Unit, a non-personnel unit or a VPO; options for such customers would accordingly be analyzed in the context of a particular discontinuance review.

## **RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT TO APWU INTERROGATORY**

**APWU/USPS-T1-12.** As described in your testimony, there are four different types of locations included on the list for evaluation with vastly different “cut-off” points used to choose the subset of locations to be included in the list for discontinuance study. In the response to DBP/USPS-10-14, it states that the cut-off points used to choose the various locations were chosen to provide a manageable number of locations for the RAO.

- a) Excluding type 4, which is self-explanatory, please describe the process that caused the Postal Service to identify the other three types of locations for this list.
- b) If, as the response to DBP/USPS-10-14 states, the cut-off points were chosen to provide a list of manageable size, how was the total target number of locations determined?
- c) How was it decided what percentage of the target number in b) should be allocated to different types of locations? After all, there is presumably some cut-off point for the Type 1 locations that could have been used that would fill the entire “manageable” number.

### **RESPONSE**

(a-c) Two years ago, the Docket No. N2009-1 SBOC optimization candidate pool was the product of a simple criterion that focused on one category of retail locations -- subordinate retail facilities in urban and suburban areas. An objective of the RAO Initiative was to subject a different and broader cross-section of facilities to optimization review. Criteria were developed to create a more diverse mix of retail facilities to study than in SBOC. There was no pre-conceived percentage or proportion of Type 1, 2 or 3 RAO retail facilities. It was determined that RAO should include at least as many facilities as SBOC and that the number of total facilities to be analyzed be kept at a "manageable" level. At the same time, consideration was given to the fact that discontinuance review adds to the existing workload of field personnel and that there are finite limits to how much additional work can be undertaken at any given time. Other candidate types could have been created. Different criteria for existing

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**RESPONSE to APWU/USPS-T1-12 (continued)**

types could have been utilized. Limiting the candidate pool to Type 1 facilities or some other homogenous type would have defeated the goal of examining a diverse pool of facilities simultaneously.